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and General Insurance Company

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

NEW YORK MARINE AND
GENERAL INSURANCE COMPANY,
a New York corporation,,

Plaintiff,

v.

Amber Heard, an individual,,

Defendant.

Case No. 2:22-cv-04685-GW(PDx)
Consolidated for pre-trial purposes with
Case no: 2:21-cv-04377 RSWL (JDEx)

**JOINT STIPULATION
EXTENDING TIME FOR NEW
YORK MARINE AND GENERAL
INSURANCE COMPANY TO
RESPOND TO DEFENDANT AND
COUNTERCLAIMANT'S AMBER
HEARD'S AMENDED
COUNTERCLAIM**

Pursuant to L.R. 8-3, Defendant and Counterclaimant Amber Heard ("Heard") and Plaintiff and Counterclaimant New York Marine and General Insurance Company ("NY Marine") hereby stipulate that New York Marine shall have a four (4) day extension of time to February 10, 2023 in which to file its response to Heard's Amended Counterclaim.

Heard filed her First Amended and Supplemental Answer and Amended Counterclaim against NY Marine on January 13, 2023, to which NY Marine would have fourteen (14) days to respond pursuant to Fed. R. Civ. P. Rule 15(a)(3). At that time, a stay of all matters was in place until January 23, 2023; the stay was lifted on January 23, 2023, and accordingly, fourteen (14) days from that date would expire on

1 February 6, 2023. Accordingly, the parties seek a four (4) day extension of time from
2 that date for NY Marine to respond to the Amended Counterclaim, to February 10,
3 2023.¹

4 The parties have not previously stipulated to any extension of time for NY
5 Marine to answer or otherwise plead to the Amended Counterclaim. The extension
6 will not alter any date or event already scheduled by the Court.

7 Dated: February 3, 2023

PASICH LLP

8
9 By: /s/ Kayla Robinson

Kirk Pasich

Kayla Robinson

10 Attorneys for Defendant and Counterclaimant

Amber Heard

11
12 Dated: February 3, 2023

McCORMICK, BARSTOW, SHEPPARD,

WAYTE & CARRUTH LLP

13
14
15 By: /s/ James P. Wagoner

James P. Wagoner

Nicholas H. Rasmussen

Graham A. Van Leuven

16 Attorneys for Plaintiff and CounterDefendant

17 New York Marine and General Insurance

Company

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19
20 **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(2)(i)**

21 Pursuant to L.R. 5-4.3.4, I, James P. Wagoner, attest that all other signatories
22 listed and on whose behalf the filing is submitted concur in this filing's content and
23 have authorized this filing.

24
25 ¹ If the Court believes that the Stay in effect on January 13, 2023 did not affect the
26 filing of the Amended Counterclaim or the calculation of NY Marine's time to
27 respond under Fed. R. Civ. P. Rule 15, then the parties respectfully request that the
28 Court grant a fourteen (14) day extension of time, from January 27, 2023 to February
10, 2023.

1 Dated: February 3, 2023

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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3 By: /s/ James P. Wagoner
4 James P. Wagoner
5 Attorneys for Defendant New York Marine and
6 General Insurance Company
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PROOF OF SERVICE

New York Marine and General Insurance Company v. Amber Heard
USDC Central District of California, Case No. 2:22-cv-04685-GW-PD

STATE OF CALIFORNIA, COUNTY OF FRESNO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Fresno, State of California. My business address is 7647 North Fresno Street, Fresno, CA 93720.

On February 3, 2023, I served true copies of the following document(s) described as **JOINT STIPULATION EXTENDING TIME FOR NEW YORK MARINE AND GENERAL INSURANCE COMPANY TO RESPOND TO DEFENDANT AND COUNTERCLAIMANT'S AMBER HEARD'S AMENDED COUNTERCLAIM** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC SERVICE (E-MAIL): Based on a court order or an agreement of the parties to accept electronic service, my electronic service address is heather.ward@mccormickbarstow.com, and I caused the document(s) to be sent to the persons at the electronic service address(es) listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 3, 2023, at Fresno, California.

/s/ Heather Ward
Heather Ward

SERVICE LIST

New York Marine and General Insurance Company v. Amber Heard
USDC Central District of California, Case No. 2:22-cv-04685-GW-PD

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